DRAFT REVISION TO THE HANFORD FACILITY WIDE DANGEROUS WASTE PERMIT

NEW CHAPTERS TO BE ADDED TO PART V OF THE HANFORD FACILITY WIDE DANGEROUS WASTE PERMIT

(Numbering will be added to the pages after final approval of the modification at the conclusion of the Public Comment Period)

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The Simulated High Level Waste Slurry Treatment and Storage Unit (SHLWS) is an inactive storage and treatment unit which is currently undergoing permanent closure activities. This TSD unit was operated as a storage and treatment unit for simulated slurry as a test operation in connection with the grout project. This Chapter sets forth the closure requirements for this TSD unit.

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COMPLIANCE WITH APPROVED CLOSURE PLAN

13 14

The Permittees shall comply with all the requirements set forth in 15 the SHLWS Closure Plan (Plan), as found in Attachment 19, including 16 - - the amendments specified in Condition V.4.B. Enforceable portions of the Plan are listed below (all subsections, figures, and tables included in these portions are also enforceable unless stated otherwise):

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1:7...

Section 1.2 Part A Permit Application

22 23

Section 1.3 Reference

24 25

Section 2.3 Description of the SHLWS T/S Unit/Physiography

26 27

Section 2.4 Location Information

28 29 30

Characteristics of Untreated Waste Section 3.1

31 32 Section 3.2 Characteristics of Treated Waste

33 34

Section 3.3 References

35 36 Section 4.1 Reference

37 38 Section 5.1 Reference

39 40 Section 6.1 General Closure Requirements

-41

- Section-6.2 ---General-Post-Closure-Requirements

42 43

Section 6.3 Closure of Chemical, Physical, and Biological Treatment Units

44 45

> References Section 6.11

46 47 48

Appendix A Sampling and Analysis Plan

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Appendix B Quality Assurance Project Plan

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1	V.4.B.	AMENDMENTS TO THE APPROVED CLOSURE PLAN
2		
3	V.4.B.a.	A written notification stating closure has been and will continue to
4		be conducted in accordance with the Plan, including the conditions of
5		the Plan, shall be submitted to the Department within 30 days after
6		the effective date of Revision 1 to this Permit.
7		
8	V.4.B.b.	The Permittees shall notify the Department, in writing, if at any
9		time it is determined the clean closure levels specified in this plan
10		are exceeded.
11		
		The Permittees and the independent, registered, professional engineer
13		certification of closure shall be prepared and submitted to the
14		Department by registered mail within 60 days of closure as described
15		in the Plan. The Permittees shall continue to address the unit as a
		dangerous waste management unit until receipt of the Department's
17		written notification stating the unit is accepted as clean closed.
18		
19	V.4.B.d.	The Permittees shall complete SHLWS closure activities 180 days after
20		the effective date of Revision 1 to this Permit.
21		
22	V.4.B.e.	There is one remaining drum marked hazardous waste on the site. This
23		drum must be held until the sampling results are received and
24		analyzed. The dispositioning of the drum will be carried out based
25		upon the final designation of the waste contained therein. The
26		Department must be informed in writing of the final disposal method
27		of this drum.
28		
29		

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CHAPTER 5

218-E-8 Borrow Pit Demolition Site

The 218-E-8 Borrow Pit Demolition Site (218 BPDS) is an inactive treatment unit which is currently undergoing permanent closure activities. This TSD unit was operated as an open burning/open detonation unit for dangerous wastes. This Chapter sets forth the closure requirements for this TSD unit.

V. 5.A. <u>COMPLIANCE WITH APPROVED CLOSURE PLAN</u>

The permittees shall comply with all the requirements set forth in the 218-E-8 Borrow Pit Demolition Site Closure Plan (Plan), as found in Attachment 20, including the amendments specified in condition V.5.B. Enforceable portions of the Plan are listed below (all subsections, figures, and tables included in these portions are also enforceable unless stated otherwise):

Part A Application

Section 2.2.2

Section 2.2.3 Description of 218-E-8 Borrow Pit Demolition Site

Facility Description and General Provisions

Section 2.4 Security Information

Chapter 3.0 Process Information

<u>31</u>

Chapter 4.0 Waste Characteristics

 Chapter 5.0 Groundwater Monitoring

Chapter 6.0 Closure Strategy and Performance Standards

 Chapter 7.0 Closure Activities

Chapter 8.0 Postclosure Plan

Appendix 4A Toxicity Data

Appendix 7A Quality Assurance Project Plan for Soil Sampling and Analysis for the 218-E-8 Borrow

Pit Demolition Site

Appendix 7B Training Course Descriptions

Appendix 7C Sampling and Analysis Plan

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1 2	V.5.B.	AMENDMENTS TO THE APPROVED CLOSURE PLAN
3 4		conducted in accordance with the Plan, including these
_		additional conditions to the Plan, shall be submitted to the
6		Department within 30 days after the effective date of Revision
7		1 to this Permit.
8	11	The results of all sampling required by this Plan shall be
9	V.5.B.b.	provided to the Department. This submittal shall include the
10 11		raw analytical data, a summary of analytical results, a data
12		validation package, and a narrative summary with conclusions.
13		
14	V.5.B.c.	The Department shall be provided, for review and approval, a
15		sampling plan and the date of sampling for any sampling event
16		not addressed in the Plan which provides data used to support
17		218 BPDS closure activities at least 30 days prior to
18		initiating actual sampling activities. The results of this sampling shall be submitted to the Department. These
19		submittals shall include the raw analytical data, a summary of
20 21		analytical results, a data validation package, and a narrative
22		summary with conclusions.
23		•
24	V.5.B.d.	The Permittees shall notify the Department, in writing, if the
25		action levels as defined in Section 6.1 of the Plan are
26		exceeded. The notification shall either include a request to
-27		dotter a bridge one fritten and an accommend a confirmation
28		activities or remedial actions, or identify the interim
29		measures to be taken at the 218 BPDS until closure activities are performed in conjunction with the 200-PO-6 Operable Unit.
30 31		are performed in conjunction with the 200-70-6 operable onit.
32	V.5.B.e.	The Permittees and the independent, registered, professional
33		engineer certification of closure shall be prepared and
34		submitted to the Department by registered mail within 60 days
35		of closure, as described in Section 6.3.2 of the Plan. The
36		Permittees shall continue to address the 218 BPDS as a
37		dangerous waste management unit until receipt of the
38		Department's written notification stating the 218 BPDS is accepted as clean closed.
39 40		accepted as cream crosed.
41	V.5.B.f.	The Permittees shall complete 218 BPDS closure activities
42	- · · · · · · · · · · · · · · · · · · ·	within 180 days after the effective date of Revision 1 to this
43		Permit.

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	CHAPTER 6
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200 West Area Ash Pit Demolition Site

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The 200 West Area Ash Pit Demolition Site (200 APDS) is an inactive treatment unit which is currently undergoing permanent closure activities. This TSD unit was operated as an open burning/open detonation unit for dangerous wastes. This Chapter sets forth the closure requirements for this TSD unit.

11 V.6.A. COMPLIANCE WITH APPROVED CLOSURE PLAN

The permittees shall comply with all the requirements set forth in the 218-E-8 Borrow Pot Demolition Site Closure Plan (Plan), as found in Attachment 21, including the amendments specified in condition V.5.B. Enforceable portions of the Plan are listed below (all subsections, figures, and tables included in these portions are also enforceable unless stated otherwise):

Part A Application

Section 2.2.2 Facility Description and General Provisions

Section 2.2.3 Description of 200 West Area Ash Pit Demolition Site

-- Section-2.4 Security Information

Chapter 3.0 Process Information

Chapter 4.0 Waste Characteristics

 Chapter 5.0 Groundwater Monitoring

 Chapter 6.0 Closure Strategy and Performance Standards

Chapter 7.0 Closure Activities

Chapter 8.0 Postclosure Plan

Appendix 4A Toxicity Data

Appendix 7A Quality Assurance Project Plan

 Quality Assurance Project Plan for Soil Sampling and Analysis for the 200 West Area Ash Pit Demolition Site

Appendix 7B Training Course Descriptions

Appendix 7C Sampling and Analysis Plan

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1 2	V.6.B.	AMENDMENTS TO THE APPROVED CLOSURE PLAN
3 4 5 6 7	V.6.B.a.	A written notification stating closure has begun and will be conducted in accordance with the Plan, including these additional conditions to the Plan, shall be submitted to the Department within 30 days after the effective date of Revision to this Permit.
8 9 10 11 12 13	·V.6.B.b.	The results of all sampling required by this Plan shall be provided to the Department. This submittal shall include the raw analytical data, a summary of analytical results, a data validation package, and a narrative summary with conclusions.
13 14 15 16 17 18 19 20 21 22 23	V.6.B.c.	The Department shall be provided, for review and approval, a sampling plan and the date of sampling for any sampling event not addressed in the Plan which provides data used to support 200_APDS_closure_activities at least 30 days_prior_to initiating actual sampling activaties. The results of this sampling shall be submitted to the Department. These submittals shall include the raw analytical data, a summary of analytical results, a data validation package, and a narrative summary with conclusions.
23 24 25 26 27 28 29 30 31	V.6.B.d.	The Permittees shall notify the Department, in writing, if the action levels as defined in Section 6.1 of the Plan are exceeded. The notification shall either include a request to develop a phase two investigation to determine further sampling activities, or remedial actions or identify the interim measures to be taken at the 200 APDS until closure activities are performed in conjunction with the 200-SS-2 Operable Unit.
32 33 34 35 36 37 38 39	V.6.B.e.	The Permittees and the independent, registered, professional engineer certification of closure shall be prepared and submitted to the Department by registered mail within 60 days of closure, as described in Section 6.3.2 of the Plan. The Permittees shall continue to address the 200 APDS as a dangerous waste management unit until receipt of the Department's written notification stating the 200 APDS is accepted as clean closed.
40 41 42 43	V.6.B.f.	The Permittees shall complete 200 APDS closure activities within 180 days after the effective date of Revision 1 to this Permit.

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1			CHAPTER 7	
2				
3				
4	•		2101-M Pond	
5				
6			ng permanent closure activities. This unit was	
7	_	operated as a disposal unit for potentially dangerous waste. This chapter sets		
. 8	for the clo	osure requirement	s for this TSD unit.	
9		COMPLEANCE STOR	ADDROVED OLOGIDE DIAN	
10	V.7.A.	COMPLIANCE WITH	APPROVED CLOSURE PLAN	
11		The Dermittees	shall comply with all requirements set forth in the	
12 .13			shall comply with all requirements set forth in the psure Plan (Plan), found in Attachment 22, including	
14			specified in Condition V.7.B. Enforceable portions of	
15			sted below (all subsections, figures, and tables	
-16-			ese-portions are also enforceable):	
17			•	
18		Appendix A-1	Part A Permit Application, Form 3	
19				
20		Section I-3	2101-M Pond Location and General Description	
21				
22		Section I-5	Security	
23				
24		Chapter A · · · ·	Closure Performance Standards	
25		Chamton D	Content of Closure Plan	
26 27		Chapter B	Content of Closure Flan	
28		Chapter C	Certification of Closure	
29			002022000000000000000000000000000000000	
30	V.7.B.	AMENDMENTS TO I	THE APPROVED CLOSURE PLAN	
31				
-32 ··	V.7.B.a.	A written notif	ication stating closure has been and will continue to	
33		be conducted in	accordance with the Plan, including these conditions	
34		of the Plan, sh	hall be submitted to the Department within 30 days	
35		after the effec	ctive date of Revision 1 to this Permit.	
36				
37	V.7.B.b.		shall notify the Department, in writing, if at any	
38			ermined the clean closure levels specified in this plan	
39	è	are exceeded.		
40		ml D	the independent maniphoned	
41	V.7.B.c.		and the independent, registered, professional engineer of closure shall be prepared and submitted to the	
42 43			registered mail within 60 days of closure, as described	
44			The Permittees shall continue to address the unit as a	
45			e management unit until receipt of the Departments	
46			cation stating the unit is accepted as clean closed.	

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1			CHAPTER 8
2			
3	•		
4		2	16-B-3 Expansion Ponds
5		•	
6		_	s undergoing permanent closure activities. This
7	_		ent and disposal unit for dangerous waste. This
· 8 · · · ·	-chapter set	s forth the closur	e requirements for this TSD unit.
9		•	
10	V.8.A.	COMPLIANCE WITH A	PPROVED CLOSURE PLAN
11	•		
12			all comply with all requirements set forth in the
13		-	Ponds Closure Plan (Plan), found in Attachment 23,
14	•	-	ndments specified in Condition V.8.B. Enforceable
15		=	lan are listed below (all subsection, figures, and
16		tables included i	n these portions are also enforceable):
17			
18		Part A Permit App	lication
19			
20		Section 1.2	Closure Strategy
21	•		
22		Chapter 2.0	Facility Description and Location Information
23			
24		Chapter 5.0	Groundwater Monitoring
25			
26		Chapter 6.0	Closure Performance Standards
27			
28		Chapter 7.0	Closure Activities
29			
30 -		Chapter 8.0	Postclosure Plan
31			•
32	V.8.B.	AMENDMENTS TO THE	APPROVED CLOSURE PLAN
33			
		and the second of the second s	and an analysis at a control to a first transfer of the control of

_ ___34_____V.8.B.a.___A_written_notification_stating_closure_has_been and will continue to ...__35_____be conducted in accordance with the Plan, including these condition of the Plan, shall be submitted to the Department within 30 days after the effective date of Revision 1 to this Permit.

V.8.B.b. Groundwater monitoring will continue in accordance with B Pond System groundwater monitoring program. Quarterly and annual groundwater monitoring reports for the wells specified in the Plan shall continue to be submitted to the Department until closure of the 216-B-3 Main -43------Pond is acknowledged by the Department in writing, or as specified 44 · · · otherwise in a postclosure permit.

V.8.B.c. The Permittees shall notify the Department, in writing, if at any 47____time_it_is_determined the clean closure levels specified in this plan are exceeded.

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1 2	V.8.B.d.	The Permittees and the independent, registered, professional engineer certification of closure shall be prepared and submitted to the
_		
3		Department by registered mail with 60-days of closure as described in
4		the Plan. The Permittees shall continue to address the unit as a
. 5		dangerous waste management unit until receipt of the Department's
6		written notification stating the unit is accepted as clean closed.
7		
8	V.8.B.e.	The Permittees shall complete 216-B-3 expansion lobes closure
9		activities within 180 days after the effective date of Revision 1 to
10	•	this Permit.

FOUR LETTERS FROM WASHINGTON STATE DEPARTMENT OF ECOLOGY TO UNITED STATES DEPARTMENT OF ENERGY ON THE COMPLETION OF THE REVIEW OF THE CLOSURE PLANS FOR THE NEW FIVE UNITS BEING ADDED TO PART V OF THE HANFORD FACILITY WIDE DANGEROUS WASTE PERMIT.